

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,
Plaintiff,
- against -
HAMZA AHMED,
Defendant.

DECLARATION OF
AMANO DUBE

15-CR-49 (MJD/FLN)

Amano Dube hereby declares under penalty of perjury that the following is true and correct:

1. I am the director of the Brian Coyle Center, one of the programs founded by the Pillsbury United Communities. I have been the director since 2013. Since coming to the United States in 1994, I have has been engaged in community building initiatives within the East African community. I have served as Executive Director of the Oromo Community of Minnesota from 2003-2011, and hold or have held many other leadership positions, including a member of the Boards of Directors for the West Bank Business Association, African Economic Development Solutions and The University District Alliance. I have an MA in Health & Human Services Administration from St. Mary's University, and a BS in Agriculture from the Alemaya University in Ethiopia.

2. The Brian Coyle Center (the "Center") is located in the Cedar-Riverside neighborhood of Minneapolis, one of the most densely populated areas in the state, with approximately 1,800 apartment units on two city blocks. Seventy percent of the inhabitants are East-African or of East-African descent. Our focus is community building. We promote social and economic equality for the residents of our neighborhood and extended community through educational, social and structural programming. Our goals are to build confidence and the

entrepreneurial spirit in youth, seniors, adults, and families, and create connections that help our community thrive as well as integrate seamlessly with the broader Minnesotan society. Our programs and mission are more fully set forth at our website: <http://www.puc-mn.org/brian-coyle-center>.

3. We are located a few blocks from the Dar Al-Hijrah Mosque, with which we have a close and mutually reinforcing relationship. Many of our program participants attend Dar Al-Hijrah.

4. I submit this declaration in connection with the release plan proposed by Hamza Ahmed's attorney. We know him and his family, and are happy to work with them.

5. When Mr. Ahmed is ultimately released from custody, we understand that the proposal is he will live with his father. The Center is interested in joining in the effort to embrace Mr. Ahmed back into the community, and encourage his participation in social, educational and employment opportunities that will both keep him productively engaged and inspire him with the possibilities for a safe and law-abiding future here in the United States. Specifically, we can commit to providing the following (subject, of course, to the Court's direction and Mr. Ahmed's consent):

6. *First*, and perhaps most importantly, we would like to provide a mentoring program for Mr. Ahmed. This one-on-one mentoring can be supplemented with group-based supportive services and culturally appropriate resources to support Mr. Ahmed's successful transition from custody to the community.

7. We have worked closely over the years with representatives of the Center for Restorative Justice and Peacemaking at the University of Minnesota. Professor Mark Umbreit

and his associates have advised us that they are willing to assist in a consultative capacity in designing and implementing restorative dialogue processes for Mr. Ahmed and his family.

8. Abdirahman Mukhtar is the Center's Youth Program Manager, who can mentor Mr. Ahmed one-on-one. Our mentoring program recognizes that some of the youth who participate in our program lack access to healthy relationships that can promote their growth into more productive members of the community, and as such, tries to address that need and dislocation.

- a. We would require Mr. Ahmed to commit to a mentoring relationship for a minimum of two hours per week throughout his supervised release period. This helps develop trust, relationship-building and friendship. To that end, Mr. Mukhtar would meet with Mr. Ahmed on a one-on-one basis to get to know him, his interests, his personality, and what he expects and can expect from this mentoring component.
- b. In addition, Mr. Mukhtar would meet with Mr. Ahmed in the company of his parents and other close family members, to better understand Mr. Ahmed's specific needs, and the dynamics of his family relationships, and the areas in these relationships that most need intervention and support.
- c. Before embarking on this endeavor, we would require Mr. Ahmed to commit to turn this moment into one of learning and growth.
- d. Notably, Mr. Mukhtar is an ideal person to conduct this one-on-one mentoring. With a career devoted to our city's East African community, Mr. Mukhtar is fully versed in the challenges our young people face and in workable solutions for addressing them. He is an expert in conflict resolution.

He just recently ran and completed the first training to certify Somali-Americans as “neutrals,” i.e. independent mediators in civil cases under Rule 114 of the Minnesota General Rules of Practice for the District Courts.

9. *Second*, our Center has several volunteer opportunities for Mr. Ahmed that would encourage his engagement with his Minnesota community. For example:

- a. Mr. Ahmed could volunteer at the Brian Coyle Center’s Soccer Program (Tuesdays and Thursdays, 6:00 p.m. to 8:00 p.m.). He would work closely with the head coach and the soccer program coordinator (Abdi Mukhtar), setting up the field and preparing practice equipment, taking attendance and updating player roster, and assisting coaches with practice drills and other tasks as needed.
- b. He could volunteer at the Food Shelf, where we offer nutritious packages of culturally specific food for youth and families in need, with an emphasis on Asian and East African cultures. Families enrolled in this program receive a regular amount of food each month, which needs to be distributed consistently and methodically by our volunteers. It is open on Monday from noon until 6 pm, Tuesday and Wednesday from noon until 3 pm, and Friday from noon until 4pm.
- c. In addition, Mr. Ahmed could volunteer with our building cleaning crew and staff.

10. *Third*, and subject to available slots, we can offer education/employment through our Coffee Cart program, and the Culinary Arts program at Waite House, our affiliate.

- a. The Triple C Coffee Cart is a business venture led by East African youth, ages

14-21. It serves soda, snacks and traditional coffee shop fare, provides refreshments and a gathering space for the Cedar-Riverside Community. It was designed and built by young men from the East African community of the Cedar-Riverside neighborhood, and builds community between youth and elders while teaching valuable entrepreneurial skills. For some of the 14-21 year old young men who take part in the Brian Coyle Center Youth Entrepreneurship Program, and who keep the coffee cart open daily, this is their first job. Through their work with Triple C, the boys learn valuable customer service, practical and business development skills.

- b. Waite House offers its Community Culinary Arts (CCA), a 10-week culinary arts training and kitchen apprenticeship program for young adults ages 16-21, who encounter unjust barriers to employment, such as poverty and education. Youth learn technical kitchen operating and management skills to achieve “ServSafe” credentials while preparing healthy meals during the Community Café for adults and youth in their community who lack access to nutritious food. Participants in the program also help prepare a free hot dinner for Kids Café, which is served to youth from 5:30-6 pm, Monday thru Thursday, and 4:30-5 pm on Fridays. CCA participants also learn to prepare healthy food in the home, including concepts of food justice, community gardening, nutrition and how food is grown.

11. *Fourth*, we can offer social opportunities with peers, who can hopefully inspire and guide Mr. Ahmed to a vision of social engagement.

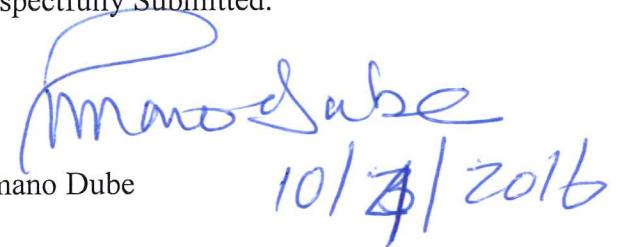
12. It is clear to us that Mr. Ahmed is in need of positive intervention at this point in his life. Can we assure the Court that our intervention will be successful? No we cannot. But we believe that the program of mentoring, education, employment and engagement set forth in this plan is the best immediate prospect for addressing the reintegration challenges our youth are facing in this city.

13. We have extensive experience at Brian Coyle dealing with young men who feel alienated from their society and culture. We have developed our highly structured culturally appropriate programs to support the youth and our efforts in this regard have been successful. Moreover, we believe strongly in giving a young person a second chance.

Date: Minneapolis, Minnesota
October 4, 2016

Respectfully Submitted.

Amano Dubé



A handwritten signature in blue ink, appearing to read "Amano Dubé". To the right of the signature is the date "10/4/2016" written in a similar blue ink.